

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of themselves and all others similarly situated,)	Civil Action No.
Plaintiffs,)	
v.)	DECLARATION OF LUCAS WILSON
U.S. DEPARTMENT OF EDUCATION and Suzanne GOLDBERG, in her official capacity as Acting Assistant Secretary for Civil Rights, U.S. Department of Education,)	
)	
Defendants.)	

I, Lucas Wilson, declare:

1. I am over 18 years of age and have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. I am a resident of Toronto, Ontario, Canada.
3. Beginning in August 2008, I became a student at Liberty University in Lynchburg, VA. I graduated in May 2012.
4. I chose Liberty University for two reasons. One was that it was an evangelical university, and I wanted to get an evangelical education. The other reason was because they had a gay conversion therapy program and I desperately wanted to be straight.
5. Liberty maintains a “Statement on Sexuality and Relationships” in the Student Honor Code, which is called “The Liberty Way.”
6. The Statement on Sexuality and Relationships states: “Sexual relations outside of a biblically ordained marriage between a natural-born man and a natural-born woman are not permissible at Liberty University. In personal relationships, students are encouraged to know and abide by common-sense guidelines to avoid the appearance of impropriety. Activities inconsistent with these standards and guidelines are violations of the Student Honor Code.”
7. I am a gay man.
8. It would have never crossed my mind to come out as gay at Liberty. I was taught to hate homosexuality. As a result, I was conditioned and taught to think that homosexuality was wrong. I fought against my own queerness. Even if I was comfortable as a gay man and even if I accepted myself, I would never have come out because of how homophobic the campus is.

9. Moreover, I feared that Liberty would punish me as a gay man.
10. Liberty continues to treat queer students poorly, actively discriminates against them, and attempts to change their orientations.
11. I remain in contact other alumni and current students at Liberty who are part of the LGBTQIA+ community. Many such students continue to face such immense hatred on a daily basis and must live in queer subterfuge.
12. While at Liberty, I chose to go to conversion therapy. My main form of therapy involved numerous individual meetings with a Liberty administrator over the course of all four years of my time at Liberty. Repression, deep-seated shame, self-hatred: these were the enduring fruits of my meetings. At the time, I didn't understand that you can't fix what isn't broken.
13. It pains me that conversion therapy remains an available option at Liberty and that it is encouraged by the administration.
14. I also attended one group conversion therapy meeting while at Liberty. While I was there, the conversion therapy group, formerly called "Masquerade," was dubbed "Band of Brothers." It is now called "Armor Bearers." The group meeting, led by Pastor Dane at the time, was held in a location on campus that was not disclosed to anyone but the group members in order to ensure secrecy.
15. Liberty's *Pathways Handbook*, from its Office of Community Life, last updated July 2020, describes Armor Bearers as follows: "This is a group that helps male students who are struggling with same-sex attraction and sexual addiction. The basis of the group is to grow as men of God. Growing as men of God takes the focus off of fixing oneself and instead allows them to grow closer to the Lord. You and your Associate Director will decide on a determined amount of meetings that you need to attend."
<https://www.liberty.edu/students/community-life/wp-content/uploads/sites/90/2020/08/Pathways-Handbook.pdf>
16. The *Pathways Handbook* goes on to say that "The Office of Community Life at Liberty University (LU) is changing the narrative for students by working with them when they accept responsibility for violating policy. Too often students view sanctions as pre-determined punishments for violating policy. Recognizing this, students who accept responsibility will be provided a 'menu' of educational opportunities to choose from that will allow them to participate in developing their own learning experience. The educational opportunities have been grouped into specific categories called Pathways."
17. Essentially, conversion therapy is part of the "menu" of educational opportunities available for same-sex attracted students "who accept responsibility" for what their homosexuality or homosexual behaviors. This "opportunity" is provided by Liberty as an alternative to disciplinary action.

18. I was very anxious when I was on campus that people would know that I am gay, so I constantly monitored how I presented myself. The school caused me a profound sense of shame, which led me to hate who I was for a very long time.
19. In addition to lasting psychological damage from Liberty, I continue to worry that potential employers will see Liberty University on my resume and not hire me, in part due to the school's homophobic views.
20. Queer students should be protected from the discrimination that I experienced at Liberty. No university that offers conversion therapy or treats LGBTQIA+ students the way Liberty University does should receive government funding.
21. I have been a federal income taxpayer in the United States.
22. Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this ____ day of March 2021.

By:

Lucas Wilson
Lucas Wilson

Lucas Wilson Declaration

Final Audit Report

2021-03-26

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By: Lauren Swain (lauren@paulsouthwick.com)

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